UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

DONALD BERDEAUX and CHRISTINE GRABLIS, Individually and Behalf of All Others Similarly Situated,

Plaintiffs,

- against -

ONECOIN LTD.; RUJA IGNATOVA; SEBASTIAN GREENWOOD; MARK SCOTT; DAVID PIKE; NICOLE J. HUESMANN; GILBERT ARMENTA; and THE BANK OF NEW YORK MELLON CORPORATION,

Defendants.

No. 19-cv-4074-VEC

RULE 7.1 DISCLOSURE

Pursuant to Federal Rule of Civil Procedure 7.1, Defendant, The Bank of New York Mellon Corporation ("BNYM"), by its undersigned counsel, hereby certifies that (1) BNYM has no parent company and (2) there is no publicly–held corporation that owns ten percent (10%) or more of BNYM's stock.

Dated: New York, New York October 21, 2020

PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP

By: /s/ Audra J. Soloway

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